

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHANGYOU.COM LIMITED
SECURITIES LITIGATION

Case No. 1:21-cv-07858-GHW

CLASS ACTION

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF PROPOSED CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff ODS Capital LLC (“Lead Plaintiff”), on behalf of itself and all other members of the proposed Settlement Class, through court-appointed Lead Counsel Labaton Sucharow LLP, hereby moves this Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (e): (i) preliminarily approving the proposed Settlement of this securities class action; (ii) preliminarily certifying the Settlement Class for purposes of the Settlement only; (iii) approving the form and manner of providing notice of the proposed Settlement to the Settlement Class, including the procedures and deadlines for objecting, seeking exclusion from the Settlement Class, and submitting Claim Forms; (iv) scheduling a date for the final Settlement Hearing; (v) appointing Strategic Claims Services as the Claims Administrator to administer the Settlement; and (vi) granting such other and further relief as the Court may deem fair and proper.

This motion is based on the accompanying Memorandum of Law in Support of Lead Plaintiff’s Motion for Preliminary Approval of Proposed Class Action Settlement and the Declaration of Carol C. Villegas, dated March 29, 2022, with annexed exhibits, filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlement, which was negotiated by the Parties to the Settlement, with annexed exhibits, is also submitted herewith.

DATED: March 29, 2022

Respectfully submitted,

LABATON SUCHAROW LLP

/s/ Carol C. Villegas

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*Counsel for ODS Capital LLC and the
Proposed Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2022, I caused the foregoing Notice of Lead Plaintiff's Motion for Preliminary Approval of Proposed Class Action Settlement to be served electronically through the Court's ECF system upon all ECF participants.

/s/ Carol C. Villegas
CAROL C. VILLEGAS